

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 15mj744 (SER)

THOMAS ROBERT PAGE

CRIMINAL COMPLAINT

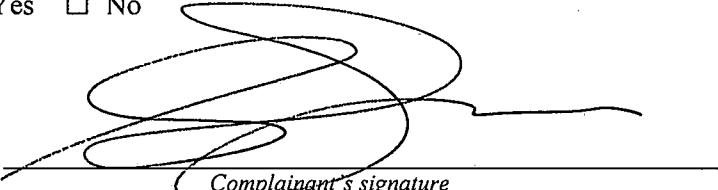
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

From on or about 2007 through on or about 2011, in Winona County, in the State and District of Minnesota, defendant did engage in illicit sexual conduct in foreign places in violation of Title 18, United States Code, Section 2423(c).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No



Complainant's signature

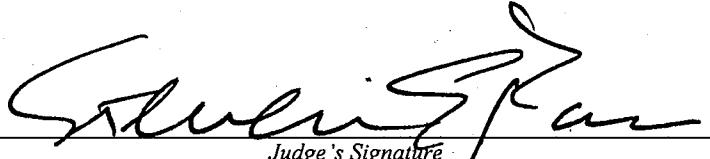
Summer Jones, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 29 Sept 2015

City and State: St. Paul, MN



Judge's Signature

Steven E. Rau, United States Magistrate Judge

Printed Name and Title

SCANNED
SEP 29 2015
U.S. DISTRICT COURT ST. PAUL

STATE OF MINNESOTA
COUNTY OF RAMSEY

ss. AFFIDAVIT OF SUMMER JONES

I, Summer Jones, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the U.S. Department of Homeland Security (DHS), Homeland Security Investigations (HSI) and have been so employed since April 2008. During my career, I have conducted and participated in several agency and joint inter-agency investigations involving unlawful importation and the distribution of controlled substances, fraud and identity theft violations, export violations, financial crimes, alien smuggling and human trafficking violations, child pornography, and various immigration violations. During these investigations, I have conducted physical surveillance, executed arrest and search warrants, reviewed tape-recorded conversations, and personally interviewed numerous sources of information as well as confidential sources. Through my training and experience, including on-the-job discussions with other law enforcement agents and cooperating suspects, I am familiar with the operational techniques and organizational structure of child pornography distribution networks and child pornography possessors and their use of computers and other media devices. Additionally, I am familiar with child molesters and the techniques they use to groom children before the molestation begins such as buying them gifts, spending time doing fun activities and becoming their friend.

2. This affidavit is submitted for the limited purpose of establishing probable cause in support of the attached complaint and, therefore, contains only a summary of the

relevant facts. I have not included each and every fact known by me concerning individuals and events described herein. The information contained in this affidavit is based on my personal observations, my training and experience, and information obtained from other agents and witnesses.

PROBABLE CAUSE

3. Robert Thomas Page (PAGE) is a United States citizen and resident of Minnesota. Since 1990, PAGE has traveled and lived overseas in places such as various countries in Africa, including Cameroon, the Democratic Republic of Congo, Burkina Faso, Mali, Sudan, and Togo. During that time period, PAGE has been a science and math teacher in schools abroad catering to Western students. PAGE travels back to Minnesota each year for vacation and summer break and resides in Winona, Minnesota. From 2007 to 2011, Page worked as a science and math teacher at the American School of Yaoundé (ASOY) in Yaoundé, Cameroon. From 2011 to 2012, Page worked as a science and math teacher at the British School Lome (BSL) in Lome, Togo.

4. As set forth in greater detail below, beginning in June 2012, HSI began investigating PAGE for various child exploitation crimes. At that time, HSI received information from the HSI Attaché Office in Paris, France, the Department of State, and school administrators from the BSL that PAGE was engaging in illicit sexual conduct with minor males. While investigating these allegations in Lome, Togo, HSI agents learned charges were brought against PAGE in Yaoundé, Cameroon, for engaging in sexual conduct with minor boys while he was a teacher at the ASOY.

5. In a number of African countries, to include Togo and Cameroon, it is illegal to be homosexual or engage in homosexual acts, especially those that involve minor boys. In Cameroon, “Pederasty” is defined as “sexual activity involving a man and a boy” and is prosecutable by law. In Togo, the charge is “Pedophilia” under article 393 of the Children’s Code of the Republic of Togo. Culturally, victims of Pederasty in Cameroon are considered to be homosexual as well, are often disowned by their families and friends, and find it difficult to secure a job. People do not typically want to associate with anybody with the label of homosexual, as they believe that associates of a homosexual must also be homosexual.

A. Beginning of HSI Investigation in Lome, Togo.

6. In the summer of 2012, PAGE was investigated by the Togo Gendarmeries based on allegations of sexual abuse of minor boys. In July 2012, based on information from the HSI Attaché Office in Paris, France, the Department of State, and school administrators from the BSL, HSI agents traveled to Lome to conduct their own investigation of the allegations. During the investigation in Togo, HSI agents received documents detailing a 2010 Gendarmerie investigation of PAGE for sexual abuse of two minor boys, A.E. and J.C.M., in Yaoundé, Cameroon.

7. On July 24, 2012, while HSI agents were in Lome, PAGE was arrested by the Gendarmeries in Togo as a result of their investigation into allegations of sexual abuse of minor boys and taken to the local police station in Lome.

8. The next day, on July 25, 2012, HSI agents conducted a Mirandized interview of PAGE at the local police station. During the interview, HSI agents

explained to PAGE why he was arrested and why agents wanted to ask him questions. PAGE agreed to answer questions and at first denied all allegations of sexual abuse of minor boys. PAGE noted that an individual named Elvis was a cook who lived with him and had been working for him for approximately three years. PAGE also stated that an individual named Serge was a friend of Elvis's who had resided with PAGE for approximately three to four months in Lome.

9. During the interview, PAGE also stated that he knew kids from the local area at the beach and that some of the boys would go to his house, watch television, and take pictures with PAGE's camera. PAGE also stated that he would buy the boys food and drinks, provide them with taxi fare to get home, and that he had given money to one boy's mom for school fees.

10. PAGE admitted that the boys would stay overnight at his house, but not in his bedroom, and that he would swim with them in his boxer shorts. He also admitted that the boys would sit on his lap at the beach. He denied any sexual conduct with any boys in Togo.

11. HSI agents then asked PAGE about the criminal charges brought against him in Yaoundé, Cameroon by the Gendarmeries there. At first, PAGE stated the allegations in Cameroon were not true. When agents asked PAGE if he would like them to read the two victim statements given to the Gendarmeries in the Cameroon case, PAGE said, "No." He told agents he had seen the reports and knew what was in them. PAGE then stated that the two boys in the police reports were local "street" boys he had met and that the boys had been to his residence on more than one occasion.

12. PAGE then admitted to engaging in oral sex with the two Cameroonian boys, but he would not admit to having anal sex with them. He admitted that he gave money to one of the boys and gave money to the other boy's mother. Page denied any sexual conduct with an individual named S.A., despite what the police reports said.

13. On July 26, 2012, HSI agents interviewed an individual identified as S.V.I.O., who was approximately seventeen years old at the time of the interview. S.V.I.O. stated that he first met PAGE in Burkina Faso when he was seven years old. PAGE was teaching there at the time. S.V.I.O. spent a lot of time with PAGE in Burkina Faso, including attending celebrations at PAGE's house at least once a month with fifteen to twenty other young boys, camping and other trips together, playing video games together, and showering together. S.V.I.O. stated that on the camping trips it would often be PAGE, himself, and one other boy on the trip, and that he would sleep in PAGE's tent. S.V.I.O. stated that PAGE would hug him in the shower and wash him "like a mother." He stated that PAGE frequently gave him money for school.

14. S.V.I.O. kept in touch with PAGE over the years and traveled to stay with PAGE in Togo. He told agents that he often slept in PAGE's bed and that PAGE would hug him, but that PAGE had never touched him inappropriately. He confirmed that PAGE paid for S.A.'s schooling in Cameroon.

B. 2012 Investigation in Yaoundé, Cameroon.

15. Based on the reports from the Gendarmerie in Cameroon and the statements by PAGE during the July 25, 2012 interview, HSI continued its investigation of PAGE in Cameroon.

1. September 2012 Interview of J.C.M.

16. In September of 2012, HSI agents traveled to Cameroon to further the investigation. On September 18, 2012, agents interviewed J.C.M., who was approximately fourteen years old at the time of the interview. J.C.M. said he first met PAGE at a bar. PAGE asked J.C.M. to sit on his lap. J.C.M. said he went to PAGE's house, where PAGE asked him to shower with PAGE and other boys. In the shower, PAGE tried to wash and touch J.C.M.'s penis and took pictures of the naked boys in the shower. J.C.M. spent the night at PAGE's house many times and said the "rule" was that boys could only sleep at PAGE's house if they were naked. He said he saw A.E. and PAGE sucking each other's penises on about ten different occasions. J.C.M. said PAGE sucked his penis one time, and he sucked PAGE's penis one time when he was twelve years old.

17. J.C.M. said PAGE told him to put his penis in PAGE's anus, but he told PAGE he would not do it. PAGE offered to pay J.C.M. 10,000 Central African Francs ("CFAs").¹ J.C.M. said PAGE made him do it, but never gave him the promised money. J.C.M. also saw PAGE put his penis into S.A.'s anus. After J.C.M. made these statements, his mother and uncle, who were present for the interview, halted the interview and refused to cooperate further with law enforcement.

¹ The value of currency fluctuates, but today 10,000 CFAs is equal to about U.S. \$17.00.

2. September 2012 Interview of Elvis

18. On September 19, 2012, HSI agents interviewed Elvis Franel Che Anene in Yaoundé. Elvis said he worked as a cook for PAGE in Yaoundé, Cameroon, and lived with and worked for PAGE in Lome, Togo. Elvis confirmed that PAGE met his relative, S.A., when S.A. was approximately twelve years old. PAGE wanted to pay for S.A.'s school. Elvis said his mother sent S.A. to a school far away because she didn't want her son to be labeled as gay. Elvis also stated that kids would go to PAGE's house in Cameroon and stay overnight, including J.C.M. and A.E.

19. Elvis saw PAGE give J.C.M.'s mother money at least once a month or more. PAGE told Elvis that J.C.M.'s mother was blackmailing him.

20. According to Elvis, PAGE moved to Togo for a job and invited Elvis to move there to cook and clean PAGE's house. Elvis moved to Togo in 2011. Serge, a friend of Elvis's from Cameroon, also traveled to Togo to work for PAGE in PAGE's home.

21. Elvis told law enforcement that in Togo, PAGE went to the beach to play with kids and have kids sit on his lap. Elvis once saw a minor boy who went to PAGE's house regularly in PAGE's bedroom, and Elvis told the boy to leave.

22. Elvis told law enforcement that he reported PAGE to the BSL because PAGE went to a hotel with five minor boys for several days. Elvis said he felt as though he had been used as a cover for PAGE's illegal activities and used by PAGE to get to his relative, S.A. Elvis was accused of being gay due to his association with PAGE.

3. September 2012 Interview of Serge

23. On September 20, 2012, HSI agents interviewed Serge Melona in Yaoundé. Serge confirmed that he worked for PAGE in Togo along with Elvis, his friend and roommate of about three years, starting in 2012. PAGE had left Yaoundé quickly after being charged with Pederasty in 2011, so Serge brought most of PAGE's belongings from Cameroon to Togo.

24. Like Elvis, Serge was accused of being gay due to his association with PAGE.

25. Serge stated that when PAGE lived in Cameroon, there were always young boys at PAGE's house. Serge confirmed that there were eleven- or twelve-year-old boys at the house all the time, including S.A. and a boy named Stephan. Serge saw kids sitting on PAGE's lap all the time.

26. In Togo, Serge saw a minor boy at PAGE's house, but most often PAGE would go to the beach with kids. According to Serge, PAGE had a lot of pictures of naked kids from the beach. Elvis said S.V.I.O., PAGE's friend from Burkina Faso, served as PAGE's guard and would notify PAGE when Serge and Elvis arrived at the house. Like Elvis, Serge reported to law enforcement that he and Elvis reported PAGE's activities to the BSL in June or July of 2012 when PAGE spent time at a hotel with kids from the beach.

C. 2015 Investigation in Yaoundé, Cameroon.

27. In July of 2015, HSI agents again traveled to Cameroon to interview numerous witnesses and victims residing in Yaoundé. The victims were interviewed at a

“safe house” owned by the U.S. Embassy in Cameroon. HSI arranged the interviews of the victims through Elvis, PAGE’s former employee and relative to victim S.A.

28. Two of the three victims, S.A. and J.C.M., are now 17 years old, while the third victim, A.E., is now 20 years old.² All of them were originally accompanied by Elvis, but S.A. asked for Elvis, his relative, to stay home while he talked with agents. All three victims consented to speaking with agents, and the interviews were conducted over the course of two days. A fourth boy, Stephan, consented to speaking with agents but, as detailed below, denied any claims of sexual abuse by PAGE.

29. All four interviewees were interviewed by HSI Forensic Interview Specialist (FIS) Amy Allen with the assistance of Adiah Nelson, a Security Data Analyst for the State Department’s Regional Security Office (RSO) at the U.S. Embassy in Yaoundé, Cameroon. Three of the four interviewees, J.C.M., A.E., and Stephan, do not speak English proficiently, so they were interviewed in French, their native language, through a translator, Adiah Nelson.

1. 2015 Interview of A.E.

30. A.E. said he met PAGE in about 2009 at a shop where drinks were sold. PAGE took boys to the beach and played with them and gave them money in return. The

² While the victims do not recall the dates of abuse, the abuse occurred between Page’s arrival in Cameroon in 2007 and the report in June 2010. During that time frame, A.E. was between approximately 12 and 15 years old, and S.A. and J.C.M. were between approximately 9 and 12 years old. Based on my training and experience, it is common for child victims of abuse to lack a clear recollection of the timing of particular instances of abuse.

boys would go to his house for food, and then some boys who PAGE could "control" would spend the night there. PAGE would give the boys drinks, make them watch pornography, and caress them.

31. A.E. stated that PAGE made A.E. perform oral sex on PAGE, and that PAGE would use lubricant to "penetrate" him. According to A.E., this happened from the time A.E. was thirteen or fourteen years old until the time A.E. was sixteen years old. PAGE took pictures of the boys naked in the shower. According to A.E., PAGE touched other boys as well: J.C.M., S.A., and Stephan. Much of the sexual abuse was conducted after PAGE made various promises to each boy, such as paying for the boys to go to school (education in Cameroon is not free).

2. 2015 Interview of S.A.

32. During his interview with FIS Allen, S.A. said he met PAGE through his relative, Elvis. S.A. stated that he sometimes slept naked in PAGE's bed. S.A. said that when PAGE drank, he would ask S.A. to sleep very close to PAGE, naked, in PAGE's bed. S.A. disclosed that one night PAGE was drunk and performed oral sex on S.A. and made S.A. perform oral sex on PAGE. S.A. stated he was 11 or 12 years old at the time this occurred. The next day, PAGE apologized to S.A. for what had happened.

33. On another occasion, PAGE performed anal sex on S.A. and made S.A. perform anal sex on PAGE.

34. S.A. stated he still receives money from PAGE for clothes and communicates with PAGE via Facebook. S.A. stated he refers to PAGE as his father and

tells his friends he receives money from his father. S.A. also stated PAGE had asked him if anybody has talked to S.A. concerning him.

35. When PAGE was jailed for Pederasty or child abuse in Cameroon, S.A. was the only person who knew. PAGE told S.A. to tell other people that PAGE was ill in the pharmacy, not in jail.

36. S.A. said that J.C.M., A.E., and Stephan were often at PAGE's house and would shower there, naked, with PAGE. Sometimes PAGE would take pictures of the naked boys in the shower.

3. 2015 Interview of J.C.M.

37. During his interview with FIS Allen, J.C.M. disclosed that PAGE took naked pictures of the young boys who went to PAGE's house. PAGE would make everyone get undressed and be naked after 7:00 p.m. every night. J.C.M. said that in addition to him, the boys who were abused by PAGE were S.A., A.E., Stephan, and a boy named Ima, who is now deceased.

38. J.C.M. said that PAGE penetrated his anus with PAGE's fingers. He also said that PAGE would put a "liquid" in S.A.'s food to make S.A. sleepy and then make everyone else leave the room. PAGE showed the young boys gay pornography.

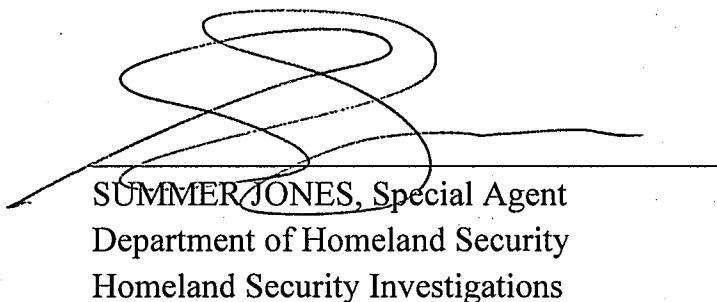
39. According to J.C.M., when PAGE asked the boys to perform sexual acts, he would promise them things. PAGE promised J.C.M. money for school and a trip to the United States. At one time, PAGE gave J.C.M.'s mom money for school.

4. 2015 Interview of Stephan

40. During his interview with FIS Allen, Stephan disclosed to law enforcement that he met PAGE the year between primary school and high school. He lived with PAGE because PAGE lived near his school. Stephan did not disclose any abuse to law enforcement.

41. Based on these facts, I believe there is probable cause to believe that Thomas Robert Page has violated Title 18, United States Code, Section 2423(c) by engaging in illicit sexual conduct in foreign places.

Further your affiant sayeth not.



SUMMER JONES, Special Agent
Department of Homeland Security
Homeland Security Investigations

Subscribed and sworn to before me this 29 day of September, 2015.



Steven E. Raу
STEVEN E. RAU
United States Magistrate Judge